Underground Storage Tank (UST) <u>Draft</u> Regulations & Tips August 10, 2016



Our Mission: To protect and improve the health and environment of all Kansans.

EPA passed new UST regulations August 8, 2015

- Kansas must revise its regulations to maintain State-program approval
- Otherwise EPA regs take effect anyway



Operator Training

- Kansas has required since 2007
- Level A/B must be certified every 4 years
- Level C (clerks and Facility employees) must be trained every year



Secondary Containment

Kansas adopted this rule July 1, 2013

Owners and operators shall install secondary containment and interstitial monitoring

- When replacing tanks
- When more than 50% of piping line replaced



Periodic walkthrough inspections

- Must use an approved inspection document
- O/O are required to maintain records of walkthrough inspections for one year

Implementation: Within three years after KDHE adopts rules



Every 30 days

- Check spill prevention equipment for damage and remove liquid or debris
- Check for and remove obstructions in the fill pipe



Every 30 days

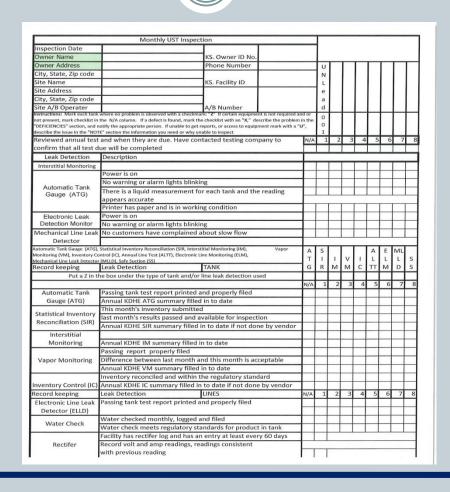
- Check the fill cap to ensure it is securely on the fill pipe
- Double-walled spill buckets with interstitial monitoring: check for a leak in the interstitial area



Every 30 days

- Check release detection equipment to ensure it is operating with no alarms or unusual operating conditions present
- Ensure release detection records are reviewed and current.







Annually

- Check containment sumps for damage and leaks to the containment area or releases into the environment
- Double-walled containment sumps with interstitial monitoring, check for a leak in the interstitial area



Annually

 Check hand-held release detection equipment, such as gauge sticks and bailers, for operability and serviceability.

Implementation: Within three years after KDHE adopts rules



Spill Containment

- Test equipment at least once every three years for liquid tightness or
- use a double-walled spill bucket with periodic (monthly) interstitial monitoring.



Spill Containment

Test:

- Spill buckets
- Contained LLD sumps
- Dispenser sumps

Implementation: Within three years after KDHE adopts rules

and Environment



Overfill Prevention Equipment

Must be inspected at least once every 3
years to ensure equipment is set to
activate at the appropriate level in the tank
when regulated substances reach that
height.



Overfill Prevention Equipment

- ATG (Outside Horn or Buzzer)
- Flapper valve
- Ball float (If it cannot be tested it must be replaced with another method)

Implementation: Within three years after KDHE adopts rules

and Environment

Release Detection Equipment

- Test annually to ensure release detection equipment is operating properly.
 - Automatic tank gauge
 - Mechanical line leak detector
 - Electronic line leak detector

Implementation: Within three years after KDHE adopts rules

Secondary Containment Testing

- Test containment sumps used for piping interstitial monitoring every three years for liquid tightness or
- use a double-walled containment sump with periodic interstitial monitoring.

Implementation: Within three years after KDHE adopts rules

Interstitial Monitoring Results

- An alarm is an example of an unusual operating condition that should be reported as a potential release
- For release investigation and confirmation, test the secondary containment of tanks and piping
- Closure is an option if a system test confirms a leak.



Ball Float Valves

 New rules eliminate the use of flow restrictors in vent lines as an overfill protection option for <u>new</u> UST systems and when overfill equipment is replaced.



Ball Float Valves

Existing ball float valves must be tested for proper operation once every three years. (If it can not be tested it must be replaced with another method)

Implementation: Immediately after KDHE adopts rules



Internally Lined Tanks

 Revises the internal lining requirement to mandate permanent closure of tanks using internal lining as the sole method of corrosion protection if the internal lining fails the periodic inspection (5 yrs) and cannot be repaired according to a code of practice.

Implementation: Immediately after KDHE adopts rules



Repairs

- Revises definition to remove the link that a repair must be associated with a release
- Adds a requirement for owners and operators to test within 30 days after a repair to spill or overfill equipment and secondary containment areas.



Repairs

 Records for each repair must be kept until the UST is permanently closed or undergoes a change in service.

Implementation: Immediately after KDHE adopts rules



Groundwater and Vapor Monitoring

O/O must demonstrate proper installation and performance through site assessments.

Implementation: Within three years after KDHE adopts rules



Notification

O/O notify the department at least 30 days prior to switching to a regulated substance containing:

- > 10 percent ethanol
- > 20 percent biodiesel



Notification

Must demonstrate compatibility by:

Certification by a nationally recognized, independent testing laboratory

or

Manufacturer approval



Standby USTs for emergency power generators must use release detection:

Implementation:

Existing USTs - Within three years after KDHE adopts rule.

New USTs - Immediately upon adoption by KDHE



Summary

Know how your UST system works.

Monitor UST facility daily and keep records

Make sure equipment used for overfill and leak detection works



Summary

Keep KDHE informed of changes at your UST facility





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